

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re

TC GLOBAL, INC.,

Debtor.

No. 12-20253

EX PARTE MOTION FOR ORDER
SHORTENING TIME FOR HEARING ON
THE DEBTOR'S MOTION FOR
AUTHORITY TO ENTER INTO
PREMIUM FINANCING AGREEMENT

TC Global, Inc. ("Debtor" or "Company") dba Tully's Coffee, debtor-in-possession herein, moves the Court on an ex parte basis for an order shortening time for hearing on the Debtor's motion for authority to enter into premium financing agreement filed contemporaneously herewith ("Insurance Motion").

The Debtor's insurance policies, including, but not limited to, property, equipment, inventory, workers compensation, automobile, and umbrella coverage expire this month, October 2012, and are due for renewal by October 27, 2012. The Debtor was able to secure insurance premium financing from Premium Assignment Corporation ("PAC") conditioned upon, among other things, the Court's approval of the Insurance Motion prior to the disbursement of any funds from PAC.

EX PARTE MOTION FOR ORDER SHORTENING TIME
FOR HEARING ON THE DEBTOR'S MOTION FOR
AUTHORITY TO ENTER INTO PREMIUM FINANCING
AGREEMENT – Page 1

1977 20121 xj189m02y3

Case 12-20253-KAO Doc 55 Filed 10/19/12 Ent. 10/19/12 15:46:39 Pg. 1 of 2

BUSH STROUT & KORNFELD LLP
LAW OFFICES

5000 Two Union Square
601 Union Street
Seattle, Washington 98101-2373
Telephone (206) 292-2110
Facsimile (206) 292-2104

1 The Debtor respectfully requests that the Court shorten the time for hearing on the Insurance
2 Motion to Friday, November 2, 2012, at 9:30 a.m. with responses due at the time of the hearing.

3 DATED this 19th day of October, 2012.

4 BUSH STROUT & KORNFIELD LLP

5
6 By /s/ Arthur A. Shwab
7 Arthur A. Shwab, WSBA #44250
8 Attorneys for TC Global, Inc.
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23